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Filing date: **06/19/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92058158
Party	Defendant Matthew Stanley
Correspondence Address	ANDREW R GILFOIL HUSCH BLACKWELL LLP 190 CARONDELET PLAZA , SUITE 600 ST LOUIS, MO 63135 UNITED STATES andy.gilfoil@huschblackwell.com, alisha.hulls@huschblackwell.com,
Submission	Request to Withdraw as Attorney
Filer's Name	Andrew R. Gilfoil
Filer's e-mail	andy.gilfoil@huschblackwell.com, alan.nemes@huschblackwell.com, alisha.hulls@huschblackwell.com
Signature	/s/ Andrew R. Gilfoil
Date	06/19/2014
Attachments	motion to withdraw.PDF(27323 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

PAC ARMOR SECURITY, INC.,)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92058158
)	
MATTHEW STANLEY,)	U.S. Reg. No. 4,267,712
)	
Registrant.)	Mark: PAC ARMOR SECURITY
)	
)	

MOTION TO WITHDRAW AS COUNSEL FOR REGISTRANT

COMES NOW, Alan S. Nemes, Alisha Hulls, Andrew R. Gilfoil and the law firm of Husch Blackwell LLP, pursuant to 37 C.F.R. §§ 2.19(b) and 10.40(a) and TBMP §513.01, and moves this Board for an Order allowing them to withdraw as counsel of record for Registrant Matthew Stanley (“Stanley”) in the above-referenced cancellation matter. In support of this Motion, counsel states as follows:

1. On or about April 29, 2014, Matthew Stanley contacted counsel and requested that counsel and Husch Blackwell LLP cease all further work on behalf of Stanley in this matter. In subsequent conversations Stanley has reiterated his desire that the undersigned law firm cease all further work on his behalf.
2. Undersigned counsel has notified Stanley of its intention to withdraw, has advised Stanley of the status of this proceeding, and has provided Stanley with time to allow for employment of other counsel.
3. Withdrawal as counsel is mandatory here under Board Rules of Practice, as counsel has been effectively “discharged by the client” from performing further work in this matter. *See* 37 C.F.R. §10.40(4).

4. The undersigned counsel has taken all appropriate steps to avoid foreseeable prejudice to the rights of Stanley. All papers and property maintained by the undersigned law firm relating to this proceeding have been forwarded to Stanley.

5. All further correspondence regarding the above-referenced opposition proceeding should be directed to Matthew Stanley at the address identified in the certificate of service below.

6. At present Stanley does not currently have alternate counsel and accordingly requests that the Board suspend this proceeding to allow him time to evaluate whether to engage new counsel or proceed in this matter pro se.

7. There is no portion of a fee paid in advance required to be returned to Stanley in this matter.

8. As noted in the Certificate of Service attached hereto, the undersigned law firm and counsel have provided service of this Motion upon Stanley and all parties to this proceeding.

WHEREFORE, the undersigned counsel respectfully request that the Board enter an order allowing them and the law firm of Husch Blackwell LLP to withdraw as counsel of record for Registrant Matthew Stanley in the above-captioned case.

Dated: June 19, 2014

Respectfully submitted,

By: /s/ Andrew R. Gilfoil
Alan S. Nemes
Alisha Hulls
Andrew R. Gilfoil
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Attorneys for Matthew Stanley

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing was served by first class mail, postage prepaid on this 19th day of June, 2014 upon:

Matthew Stanley
416 La Motte Lane
Ferguson, MO 63135

and

Morris Turek
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Counsel for Petitioner

/s/ Andrew R. Gilfoil